

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JANE DOE, LUKE LOE, RICHARD ROE, and
MARY MOE, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

THE TRUMP CORPORATION, DONALD J.
TRUMP, in his personal capacity,
DONALD TRUMP JR., ERIC TRUMP, and
IVANKA TRUMP,

Defendants.

No. 18 Civ. 9936

**NOTICE OF PLAINTIFFS' MOTION TO COMPEL
THE MGM ENTITIES TO MAKE AVAILABLE TO PLAINTIFFS
A LIMITED SUBSET OF VIDEO FOOTAGE**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Plaintiffs' Motion to Compel Nonparties Metro-Goldwyn Mayer Studios, Inc. and JMBP, LLC (collectively, "the MGM Entities") to make available to Plaintiffs a limited subset of video footage, the Declaration of Alexander J. Rodney, Plaintiffs' letter-motion requesting a pre-motion conference concerning their discovery dispute with the MGM Entities (Doc. No. 129), Plaintiffs' letter in further support of that letter-motion (Doc. No. 144), all pleadings filed in this action, and pursuant to this Court's Order dated January 23, 2020 (Doc. No. 146), Plaintiffs Jane Doe, Luke Loe, Richard Roe, and Mary Moe, by their undersigned attorneys, by and through their counsel, Kaplan Hecker & Fink LLP, will move this Court before the Honorable Lorna G. Schofield, United States District Judge, at the United States District Court, Southern District of New York, 40 Foley Square, New York, New York 10007-1312, on a date and time to be determined by the Court, for

an order pursuant to Rule 45(d) of the Federal Rules of Civil Procedure compelling the MGM Entities to make available to Plaintiffs a limited subset of video footage responsive to Plaintiffs' document subpoenas, and awarding Plaintiffs such other, further, and different relief as this Court deems to be just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the January 23, 2020 Order of this Court (Doc. No. 146), the MGM Entities' papers in opposition, if any, are due on or before February 21, 2020, and Plaintiffs' reply papers, if any, are due no later than February 28, 2020.

Dated: February 7, 2020
New York, New York

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CERTIFICATE OF SERVICE

I hereby certify that on this 7th day of February, 2020, I have caused service of the foregoing Notice of Plaintiffs' Motion to Compel Nonparties Metro-Goldwyn Mayer Studios, Inc. and JMBP, LLC (collectively, "the MGM Entities") to make available to Plaintiffs a limited subset of video footage, the Declaration of Alexander J. Rodney and its accompanying exhibits, to be made by electronic filing with the Clerk of the Court using the CM/ECF system, which will send a Notice of Electronic Filing to all counsel of record, in addition to causing service to be made by email and overnight delivery on counsel for the MGM Entities.

Dated: February 7, 2020
New York, New York



Roberta A. Kaplan, Esq.